

**UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

NICOLE T. WORTMAN and SHANE W.
WORTMAN, individually, and on behalf of all
others similarly situated,

Plaintiffs,

v.

RUSHMORE LOAN MANAGEMENT
SERVICES LLC,

Defendant.

Case No. 1:19-cv-02860

Honorable Judge Virginia M. Kendall

**PLAINTIFFS' UNOPPOSED MOTION TO EXTEND TIME
TO FILE RESPONSE TO DEFENDANT'S MOTION TO DISMISS**

NOW COME Plaintiffs NICOLE T. WORTMAN and SHANE W. WORTMAN, individually, and on behalf of all others similarly situated ("Plaintiffs"), through their undersigned counsel, moving the Court to extend the time to respond to Defendant, RUSHMORE LOAN MANAGEMENT SERVICES LLC's ("Defendant") Motion to Dismiss, and in support thereof, stating as follows:

1. On June 24, 2019, Plaintiffs filed their first amended complaint against Defendant seeking redress for Defendant's violations of the Fair Debt Collection Practices Act ("FDCPA").

[Dkt. 19]

2. On July 15, 2019, Defendant filed a Motion to Dismiss ("Defendant's Motion").

[Dkt. 20]

3. On July 19, 2019, this Court, *sua sponte*, issued an Order setting a briefing schedule on Defendant's Motion. [Dkt. 22]

4. The Order set August 2, 2019 as the deadline for Plaintiffs to submit their response to Defendant's Motion, and August 9, 2019 as the deadline for Defendant to reply. *Id.*

5. Due to other professional obligations, the undersigned needs additional time to submit Plaintiffs' response to Defendant's Motion.

6. Accordingly, Plaintiffs are respectfully seeking an extension through August 16, 2019 to respond to Defendant's Motion.

7. The undersigned conferred with Defendant's counsel about the relief sought herein, and Defendant has no objection.

8. The request for an extension of time is not meant for purposes of unnecessary delay and will not prejudice any party in the litigation.

WHEREFORE, Plaintiffs respectfully request that this Honorable Court extend the deadline to file their response to Defendant's Motion through August 16, 2019, and extend Defendant's deadline to submit their reply through August 23, 2019, and for any other relief this Court deems appropriate.

DATED: August 2, 2019

Respectfully submitted,

/s/ Joseph S. Davidson

Joseph S. Davidson
Mohammed O. Badwan
SULAIMAN LAW GROUP, LTD.
2500 South Highland Avenue
Suite 200
Lombard, Illinois 60148
+1 630-575-8181
jdavidson@sulaimanlaw.com
mbadwan@sulaimanlaw.com

CERTIFICATE OF SERVICE

I hereby certify that on August 2, 2019, I electronically filed the foregoing with the Clerk of the Court for the United States District Court for the Northern District of Illinois by using the CM/ECF system. I certify that all participants in the case are registered CM/ECF users and that service will be accomplished by the CM/ECF system.

s/ Joseph S. Davidson